

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENTAttorney Reference Number 3382-65018-01  
Application Number 10/656,301**REMARKS**

Claims 1-38 were pending in this application. Claims 1, 18, 19 and 36 are amended for editorial reasons. Claims 28-31 are canceled without prejudice. Claims 39-42 are added to this application. After entry of this amendment, 1-27 and 32-42 will be pending in this application. The Office action dated July 10, 2007 ("Office action") rejects claims 1-27 and 33-36 under 35 U.S.C. §102(a) as being anticipated by US Patent No. 6,546,188 to Ishii *et al.* ("Ishii"). Claims 28-31 are objected to for being dependent upon a rejected base claim, but allowable if rewritten in independent form. Claims 37 and 38 are allowed. Applicants traverse the rejections.

**I. Rewritten Claims**

As noted above, claims 28-31 are objected to for being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. Dependent claims 28 and 30 have been rewritten in independent form as claims 39 and 41, respectively. Dependent claims 29 and 31 have been rewritten as claims 40 and 42, respectively. Dependent claims 28-31 are hereby canceled and claims 39-42 should be allowable.

**II. Ishii**

In the interest of reaching a shared understanding of the Ishii disclosure, the Applicants make the following observations.

Ishii describes an editing system that includes a computer 2, a hybrid recorder 3, and a picture effects device 6. (Ishii, Figures 1 and 2, 7:22-57.) The hybrid recorder 3 accepts video signals V1 as input and produces video signals V2 and V3 as output. The picture effects device accepts video signals V3 (and/or V4) as input and produces video signals V5 and V6 as output. *Id.*

The hybrid recorder 3 records the video signals in a built-in hard disk, encodes the video signals, decodes the video signals and outputs the video signals V2 ("almost the same as video signals V1") and V3 (after encoding/decoding). For encoding, "[t]he encoder 306 converts the analog video signals supplied from the first switch 304 into digital video signals, and also compresses and encodes the digitized video signals in increments of frames based on the MPEG

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENT

Attorney Reference Number 3382-65018-01  
Application Number 10/656,301

(Moving Picture Experts Group) standards.” (Ishii, 36:46-50.) After recording and other processing, the encoded video signals are supplied to the decoder 305, which decodes them and outputs analog video signals.

The decoder 305 is for decoding the video signals which have been compressed and encoded in increments of frames, and the decoder 305 decodes the input video signals based on the MPEG standard. The decoder 305 also converts the decoded digital video signals into analog video signals, and outputs the video signals the first time coded adding unit 311. (Ishii, 39:24-30.)

The decoded video signals are output to a picture effects device 6 as video signals V3. The picture effects device 6 applies certain effects to the video signals, which are then output to the computer 2 as video signals V6. Ishii specifies that the picture effects device:

takes the video signals V3 from the video signals V3 and audio signals A3 supplied from the hybrid recorder 3 and subjects these video signals V3 to certain processing, following which these are output to an unshown device as video signals V5. . . . The picture effects device 6 also supplies video signals with special effects applied thereto to the main unit 2a of the computer 2 as composite video signals, in the form of video signals V6. (Ishii, 7:46-57.)

The disclosure further specifies that the picture effects device “provides the video signals V3 with effects according to the commands from the computer 2, and outputs the video signals as composite video signals V6 to the computer 2.” (Ishii, 11:34-36.) Figure 4 shows a series of inputs leading to an image computing device wherein “[t]he image computing device 720 provides certain effects to the image data input from the terminals, and the image data to which effects have been applied are output from the terminals M/E or DFS.” (Ishii, 13:45-48.) Then:

The cross-point switch 717 selects one of the image data input from the terminal M/E or DFS, and outputs this to the terminal MON or PGM. The image data output from the terminal MON of the cross-point switch 717 is converted into composite video signals by means of the composite signal converter 721, and is output to the computer 2 from the terminal 723 as video signals V6. . . .

The video data output from the terminal PGM of the cross-point switch 717 is input to the picture output processing unit 724, and following certain image processing, is input to the picture audio synthesizing circuit 725, and is synthesized with the audio signals input from the audio compressor 745. The signals output from the picture audio synthesizing circuit 725 are converted from parallel data to serial data by the parallel/serial converter 726, and output from the terminals 727 through 730 to an unshown device. (Ishii, 14:1-18.)

The picture effects can include Wipe, Mix, Mosaic, P-in-P, Page Turn, DSK, Modify, Cut, Slide,

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENT

Attorney Reference Number 3382-65018-01  
Application Number 10/656,301

Flip/Tumble, 2-D rotation, or 3-D rotation. (See Ishii, 59:6-37.)

### **III. Claims 1-15 should be allowable**

The Office action rejected claim 1-15 as being anticipated by Ishii. The Applicants respectfully disagree. Ishii fails to teach or suggest at least one limitation of claim 1.

Claim 1 recites:

in a compressed bit stream, outputting the effect parameters and the one or more compressed original still images, thereby producing output for a sequence of vivid video comprising the one or more synthesized images so as to facilitate synthesis of the one or more synthesized images by a decoder with the effect parameters.

According to claim 1, an encoder gets effect parameters for one or more synthesized images derived from one or more original still images. In producing a sequence of vivid video comprising the one or more synthesized images, the encoder *outputs the effect parameters compressed original still image(s) in a compressed bit stream*. This facilitates synthesis of the one or more synthesized images by a decoder with the effect parameters. As an example, the application states:

an encoder gets effect parameters for synthesized images derived from original still images. For example, the parameters include affine coefficients for panning, zooming and/or rotation effects, or the parameters include fading coefficients for fading or blending effects. The encoder compresses the original still images, and then outputs the effect parameters and compressed original still images. (Application, page 3.)

The application then describes an example of a decoder that, at a future time, can use the output effect parameters to synthesize the one or more synthesized images.

a decoder receives compressed original still images and effect parameters for synthesized images. The decoder decompresses the still images. The decoder then composes the synthesized images based upon the effect parameters and the decompressed still images. For example, the decoder computes component images based upon the effect parameters and the decompressed images, and then combines the component images for a synthesized image. *Id.*

Ishii describes, by contrast, video signals supplied to an encoder that “compresses and encodes the digitized video signals in increments of frames based on the MPEG (Moving Picture Experts Group) standards.” (Ishii, 36:48-50.) The video signals are then decoded and output as

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENTAttorney Reference Number 3382-65018-01  
Application Number 10/656,301

analog video signals to a picture effects device. The picture effects device subjects these video signals to certain processing, following which they are output as composite video signals. (Ishii, 7:48-50, 13:45-48, 14:1-18.) Elsewhere, Ishii describes the picture effects device 6 as supplying "video signals with special effects applied thereto to the main unit 2a of the computer 2 as composite video signals, in the form of video signals V6." (Ishii, 7:54-57.) Thus, to the extent that Ishii describes applying special effects to an image, Ishii indicates that the image (with special effect applied to it) is output as part of a composite video signal. Effect parameters are not output with the images. Outputting composite video signals in which special effects have been applied to images (as in Ishii) is different than, and does not teach or suggest, "in a compressed bit stream, outputting the effect parameters and the one or more compressed original still images" as recited by claim 1.

Claim 1 should be allowable. Claims 2-15 depend from claim 1 and therefore should be allowable. In view of the foregoing comments, the Applicants will not belabor the merits of the separate patentability of claims 2-15. Claims 2-15 should be allowable.

#### **IV. Claims 16-18 should be allowable**

The Office action rejects claims 16-18 as being anticipated by Ishii. Applicants respectfully disagree. Ishii fails to teach or suggest at least one element of claim 16.

Claim 16 recites "an effect parameterizer for getting effect parameters for one or more synthesized images" as well as "a multiplexer for outputting the effect parameters and the one or more compressed original still images."

As discussed above, according to Ishii, video signals are output to a picture effects device which "supplies video signals with special effects applied thereto to the main unit 2a of the computer 2 as composite video signals, in the form of video signals V6." (Ishii, 7:54-57, emphasis added.) To the extent that Ishii describes applying special effects to an image, Ishii indicates that the image (with special effect applied to it) is output as part of a composite video signal. Effect parameters are not output with the images. Ishii does not teach or suggest "a multiplexer for outputting the effect parameters and the one or more compressed original still images" as recited by claim 16.

Claim 16 should be allowable. Claims 17 and 18 depend from claim 16 and therefore should be allowable. In view of the foregoing comments, the Applicants will not belabor the

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENT

Attorney Reference Number 3382-65018-01  
Application Number 10/656,301

merits of the separate patentability of claims 17 and 18. Claims 17 and 18 should be allowable.

**V. Claims 19-27 and 32 should be allowable**

The Office action rejects claims 19-27 and 32 as being anticipated by Ishii. Applicants respectfully disagree. Ishii fails to teach or suggest at least one element of claim 19.

Claim 19 recites "receiving output in a compressed bit stream for a sequence of vivid video comprising one or more synthesized images, the output including one or more compressed original still images and effect parameters for the one or more synthesized images."

Ishii describes, by contrast, video signals supplied to an encoder that "compresses and encodes the digitized video signals in increments of frames based on the MPEG (Moving Picture Experts Group) standards." (Ishii, 36:48-50.) The video signals are then decoded and output as analog video signals V3 to a picture effects device 6. The picture effect device 6 "provides the video signals V3 with effects according to the commands from the computer 2, and outputs the video signals as composite video signals V6 to the computer 2." (Ishii, 11:34-36; *see also* 7:48-50, 13:45-48, 14:1-18.) Thus, to the extent that Ishii describes receiving commands for effects, the commands for effects are not received as part of a compressed bit stream, nor are they received as part of output that also includes compressed original still images. Receiving effect commands from one source and receiving decompressed images in an analog video signal from another source (as in Ishii) is different than, and does not teach or suggest, "receiving output in a compressed bit stream for a sequence of vivid video comprising one or more synthesized images, the output including one or more compressed original still images and effect parameters for the one or more synthesized images" as recited by Claim 19.

Claim 19 should be allowable. Claims 20-27 and 32 depend from claim 19 and therefore should be allowable. In view of the foregoing comments, the Applicants will not belabor the merits of the separate patentability of claims 20-27 and 32. Claims 20-27 and 32 should be allowable.

**VI. Claims 33-36 should be allowable**

The Office action rejects claims 33-36 as being anticipated by Ishii. The Applicants respectfully disagree. Ishii fails to teach or suggest at least one limitation of claim 33.

Claim 33 recites "a demultiplexer for receiving one or more compressed original still

KBR/MSM:cmw 10/19/07 743236 302243.02  
PATENT

Attorney Reference Number 3382-65018-01  
Application Number 10/656,301

images and effect parameters.”

Ishii does not teach or suggest “a demultiplexer for receiving one or more compressed original still images and effect parameters” as recited by claim 33. As discussed above, according to Ishii, video signals are decoded by the hybrid recorder 3 and output as analog video signals V3 to a picture effects device 6. The picture effect device 6 “provides the video signals V3 with effects according to the commands from the computer 2, and outputs the video signals as composite video signals V6 to the computer 2.” (Ishii, 11:34-36; *see also* 7:48-50, 13:45-48, 14:1-18.) Receiving effect commands from one source and receiving decompressed images in an analog video signal from another source (as in Ishii) is different than, and does not teach or suggest, “a demultiplexer for receiving one or more compressed original still images and effect parameters” as recited by claim 33.

Claim 33 should be allowable. Claims 34-36 depend from claim 33 and therefore should be allowable. In view of the foregoing comments, the Applicants will not belabor the merits of the separate patentability of claims 34-36. Claims 34-36 should be allowable.

### CONCLUDING STATEMENT

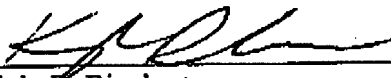
Applicants believe that the foregoing comprises a full and complete response to the Office Action of record. Withdrawal of the pending rejections and reconsideration of the claims is respectfully requested. If the Examiner believes that there are any remaining issues in the case that could be resolved by a telephonic interview, the Examiner is encouraged to contact the representative for Applicants listed below to discuss any outstanding matters.

Respectfully submitted,

KLARQUIST SPARKMAN, LLP

One World Trade Center, Suite 1600  
121 S.W. Salmon Street  
Portland, Oregon 97204  
Telephone: (503) 595-5300  
Facsimile: (503) 595-5301

By

  
\_\_\_\_\_  
Kyle B. Rinehart  
Registration No. 47,027